

FILED

JAN 20 2010

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____ DEPUTY CLERK

UNITED STATES OF AMERICA)

V.)

CR. NO. MO-09-CR-238

JOHN CHRISTOPHER BRUNSON)

FACTUAL BASIS

If this case had gone to trial, the Government would have proven the following beyond a reasonable doubt:

That on or about September 3, 2009, in the Western District of Texas, the Defendant,


JOHN CHRISTOPHER BRUNSON,

being a parent or legal guardian of a minor, did knowingly permit such minor to engage in sexually explicit conduct for the purpose of producing a visual depiction, to wit: photographs, of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce. A violation of Title 18, United States Code, Section 2251(b).

Specifically, prior to September 3, 2009, the defendant took lascivious photographs of his three year old daughter. Some of these photographs depicted a lascivious display of the child's genitalia, ~~while others included photos of the child performing oral sex on the defendant.~~ These photographs were taken using a digital camera that was manufactured outside of the state of Texas, they were then uploaded onto the defendant's computer and saved there.

2009
5.21
KJ

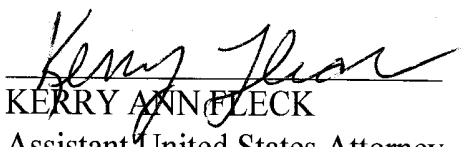

JOHN CHRISTOPHER BRUNSON
Defendant


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Date: 01-20-10

By:


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